

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Janus Overseas Fund, et al.

Plaintiff	Case Number
vs.	
Petróleo Brasileiro S.A.- Petrobras, et al.	

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Petrobras Securities Litigation

Plaintiff	Case Number
vs.	1:14-CV-09662-JSR
Defendant	

Status of Earlier Filed Case:



Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)



Open

(If so, set forth procedural status and summarize any court rulings.)

On December 8, 2014, the first of several putative class action complaints was filed on behalf of investors in Petróleo Brasileiro S.A.- Petrobras ("Petrobras"), alleging violations of the federal securities laws in connection with a multi-billion dollar bribery and kickback scheme. Lead Plaintiff Universities Superannuation Scheme, Ltd. filed a Consolidated Amended Complaint on March 27, 2015. On November 30, 2015, Lead Plaintiff filed a consolidated fourth amended class action complaint.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case arises from the same underlying conduct, involves many of the same defendants, and alleges similar causes of action based on the same conduct as the earlier filed case, In re Petrobras Securities Litigation, No. 1:14-CV-09662-JSR, pending before Judge Rakoff. As a result, there will be substantial overlap between the two proceedings and a strong likelihood that the parties would seek coordinated discovery, in the interest of efficiency.

Signature:



Date: December 28, 2015

Firm:

Lieff Cabraser Heimann & Bernstein, LLP